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**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No.: 3:15-CR-00438-JO**

**Plaintiff,**

**GOVERNMENT'S MOTION TO  
CORRECT ITS OPPOSITION TO  
DEFENDANT'S MOTION TO  
DISMISS FOR VINDICTIVE  
PROSECUTION (DOC. 74.)**

**v.**

**WINSTON SHROUT,**

**Defendant.**

The United States of America, by and through Billy J. Williams, United States Attorney for the District of Oregon, Stuart A. Wexler and Lee Langston, Trial Attorneys, Tax Division, hereby moves to correct its Opposition to Defendant's Motion to Dismiss for Vindictive Prosecution. (Doc. 74.)

The Government's pleading indicated that "records indicate two subpoenas were issued by the Grand Jury in this matter in late-February/early-March, 2015." Doc. 74 at 8. This is

**GOVERNMENT'S MOTION TO  
CORRECT ITS OPPOSITION TO  
DEFENDANT'S MOTION TO DISMISS  
FOR VINDICTIVE PROSECUTION (DOC. 74.) - 1**

factually incorrect. Government records indicate that the two subpoenas were issued in late-February/early-March, **2016**. The Government first became aware of the error through the defendant's Reply, filed March 27, 2017. (Doc. 76.) The Government hereby apologizes for the error and requests the record reflect the appropriate change.

DATED this 28th day of March, 2017.

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

/s/ Stuart A. Wexler  
STUART A. WEXLER  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 28, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney(s) of record for the defendant. Additionally, a copy of the foregoing was emailed to the defendant at milieannjones@gmail.com.

*/s/ Stuart A. Wexler*

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Stuart A. Wexler  
Trial Attorney, Tax Division